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19 CHICAGO TITLE INSURANCE COMPANY; FIDELITY
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21 NEVADA, INC.

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28 **UNITED STATES DISTRICT COURT**

DISTRICT OF NEVADA

BANK OF AMERICA, N.A.,

Plaintiff,

vs.

CHICAGO TITLE INSURANCE
COMPANY et al.,

Defendants.

Case No.: 3:20-CV-00046-MMD-CSD

**STIPULATION AND ORDER TO
CONTINUE DEADLINE TO RESPOND
TO SECOND AMENDED COMPLAINT
(ECF NO. 72)**

FIRST REQUEST

COMES NOW defendants Chicago Title Insurance Company (“Chicago Title”), Fidelity
National Title Group, Inc., (“FNTG”) and Ticor Title of Nevada, Inc. (“Ticor Agency”)
(collectively, “Defendants”) and plaintiff Bank of America, N.A. (“BANA”), by and through their

1 respective attorneys of record, which hereby agree and stipulate as follows:

2 1. On October 11, 2022, the Court granted the Parties' stipulation allowing BANA to
3 file a second amended complaint in this action, and setting Defendants' respective response
4 deadlines for 30 days after the filing of that amended complaint (ECF No. 68);

5 2. On November 17, 2022, BANA filed its second amended complaint (the "SAC")
6 (ECF No. 72);

7 3. Pursuant to the October 11, 2022 stipulation, Defendants' responses to the SAC is
8 currently due on December 19, 2022;

9 4. Defendants request a forty-five (45) day extension of their respective deadlines to
10 respond to the SAC, through and including Thursday, February 2, 2023, so as to fully respond to
11 the allegations of the SAC and to account for scheduling conflicts as a result of the holiday
12 season;

13 5. The parties therefore agree and stipulate that Defendants' respective deadlines to
14 respond to the SAC shall be continued through and including February 2, 2023.

15 6. Counsel for BANA does not oppose the requested extension;

16 7. This is the first request for an extension made by counsel for Defendants, which is
17 made in good faith and not for the purposes of delay.

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1 8. This stipulation is entered into without waiving any of Defendants' objections
2 under Fed. R. Civ. P. 12.

3 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
4 complaint are hereby continued through and including February 2, 2023.

5 Dated: December 19, 2022

SINCLAIR BRAUN LLP

7 By: /s/-Kevin S. Sinclair

8 KEVIN S. SINCLAIR

Attorneys for Defendants

9 CHICAGO TITLE INSURANCE

COMPANY; FIDELITY NATIONAL TITLE

10 GROUP, INC.; and TICOR TITLE OF

NEVADA, INC.

11 Dated: December 19, 2022

WRIGHT FINLAY & ZAK, LLP

13 By: /s/-Lindsay D. Dragon

14 LINDSAY D. DRAGON

Attorneys for Plaintiff

15 BANK OF AMERICA, N.A.

16 **IT IS SO ORDERED.**

17 Dated this 19th day of December, 2022.

18 
19 CRAIG S. DENNEY

UNITED STATES MAGISTRATE JUDGE